APPENDIX B

Tank Closure Reports

APPENDIX B.1

RDT Environmental Services Closure Report
(FT-12 and FT-13)

CLOSURE REPORTS

FOR THE

TWO DIESEL TANKS
AND ASSOCIATED PIPING OUTSIDE
OF B011 AND B012

Hazardous Materials Permit # 06-030763-HZ
Hazardous Materials Permit # 06-030764-HZ

AT THE

HITACHI CAMPUS
5600 COTTLE ROAD
SAN JOSE, CA 95193

January 3, 2007

Prepared by:

RDT Environmental Services, Inc.
7011 Realm Drive A-4
San Jose, CA 95119

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ATTACHMENTS

1.0 INTRODUCTION

RDT Environmental Services (RDT) was contracted by Hitachi to perform decontamination, demolition, recycling of one tank, saving one tank for future use on site and strip out of associated piping on the Hitachi campus. The two tanks were located outside of B011 and B012. The tank at B011 had piping connected to a back up generator located next to it. The tank at B012 had piping connected to a back up generator located inside B012. Neither back up generator was part of these closure applications. The systems in question are located at the Hitachi Campus B011 and B012 at 5600 Cottle Road, San Jose, CA 95193.

This closure report is submitted to certify that the scope of work in this project was completed utilizing techniques described in the approved Closure Work Plan attached to both permit applications Hazardous Materials Permit # 06-030763-HZ and # 06-030764-HZ. This report is intended to comply with requirements of the City of San Jose, Bureau of Fire Prevention, Hazardous Materials Division for a closure report.

2.0 UNIT DESCRIPTION

Both tanks previously contained diesel fuel for the back up generators at B011 and B012. B011 is considered a historic resource; its ultimate disposition is not determined. B012 is being demolished as part of the major renovation project taking place on site. RDT was contracted by Hitachi to assist with the closure of the two tanks and associated piping as noted in the approved Work Plan with the City of San Jose, Bureau of Fire Prevention, Hazardous Materials Division (HazMat) **(Attachment 1.0)**. These components included one tank at B012 which is being saved on site for future use. Hitachi will apply for an installation permit in the future when they plan on putting this tank back into service. One tank from B011 was recycled and the associated piping systems for both tanks.

3.0 PROJECT SUMMARY

3.1 Decontamination

The project decontamination process for the tanks went as follows:

1) First, the diesel product was removed by Hitachi and placed into other diesel tanks on campus for use.
2) Next, the tanks were pressured washed with hot water and simple green.
3) The rinse water was then removed and drummed up for disposal by Hitachi.

4) Next, rinsing procedure were repeated three more times until we completed the decontamination process.
5) The last step was to vacuum out the bottom of each tank to remove any residual water.

3.2 Strip Out

- On this project we stripped out the piping from the two tanks to the back up generators and placed the pipe into two drums for disposal by Hitachi **(Attachment 4.0)**.
- The tank at B011 was sent to Sims Metal for recycling **(Attachment 5.0)**.
- Before the tank left the Hitachi campus, a 2' by 2' hole was cut into the tank rendering it useless.
- The tank at B012 was moved to the tennis courts for future use by Hitachi.
- Both cement pads were inspected for cracks by the fire department inspector and based on observations; no compromise of the pads was noted.
- No sampling of the pads was required after the tanks were removed.
- The vault at B011 was left in place as well as the pad at B012.

3.3 Disposal

Disposal rinse water, piping, PPE and raw product was handled in the following manners **(Attachment 4.0):**

- Rinse water from the decontamination process was placed into six-55 gallon drums and transported to B042 for holding prior to off site disposal by Hitachi.

- Raw diesel product was collected in one-5 gallon container and transported to B042 for holding prior to off site disposal by Hitachi.

- Piping was placed into two-55 gallon drums and transported to B042 for holding prior to off site disposal by Hitachi.

- PPE, rags, plastic, etc. for the entire project was placed into two fiber drums and sent to B042 for them to manage through their normal waste stream management program.

4.0 REGULATORY COMPLIANCE AND NOTIFICATION

4.1 Notification

RDT prepared and submitted a Work Plan dated October 17, 2006 **(Attachment 1.0)** to the City of San Jose Fire Department, Hazardous Materials Division for this project along

with a Hazardous Materials Storage System Permit Application for each tank and associated pipe system **(Attachment 2.0)**. It consisted of the decontamination of two tanks, strip out of associated piping and site inspection of existing slabs below each tank. The Work Plan for both tanks was approved on October 25, 2006 **(Attachment 1.0).** No pre-inspection of the two tanks had previously been performed on site by the city. On November 3, 2006 the City of San Jose Fire Department, Hazardous Materials Division inspected both tanks and provided a signed Haz Mat Permit Final, project complete for both permit numbers issued. This report will be sent to the city and we will receive the hard copies of the signed off permits back in to mail **(Attachment 3.0).**

Since we provided one Work Plan to the city and they requested we pull two permits, one for each tank, we have written this Closure Report for both tanks. A copy of this report will be submitted to the city for each permit to close out Haz Mat Permits #'s 06-030763-HZ and 06-030764-HZ.

4.2 Work Plan

Based on the Work Plan submitted for this scope of work, the City of San Jose Fire Department, Hazardous Materials Division issued permit No.06-030763-HZ and 06-030764-HZ for the decontamination of two tanks, strip out of associated piping and inspection of the pads underneath the two tanks.

Scope of Work

Working with Hitachi's E H & S Department, RDT followed the Hitachi SOW prepared for this project dated 9-7-06 for the closure of two tanks and associated piping.

In general, we completed the following scope of work on this project which consisted of the following major components:

- Hitachi first notified BAAQMD about the closure of these two generator/tank systems.
- RDT wrote a Work Plan and submitted a closure application to the San Jose Fire Department, Hazardous Materials Division for each tank and associated piping system.
- Facility maintenance emptied the raw product from both tanks.
- RDT then deconed both tanks and drummed up the associated piping as hazardous waste.
- The tank at B011 was sent to Sims Metal to be recycled.
- The tank was first triple rinsed and the rinse water was collected.
- After this was completed, the tank was made safe for removal from the vault by adding dry ice sufficient to achieve an atmosphere of either less that 10% oxygen or less then 20% LEL.
- Before the tank left the Hitachi campus, a 2' by 2' hole was cut into the tank rendering it useless. The tank was then taken to Sims Metal for recycling.

- The back up generator at B011 was moved to the tennis courts for future use.
- The tank at B012 was also moved to the tennis courts for reuse by Hitachi.
- Prior to this taking place, the tank was triple rinsed and the rinse water was collected.
- The tank was decontaminated to scrap metal status and once the fire department cleared the tank, it was relocated to the tennis courts for reuse by Hitachi.
- The back-up generator inside B012 was left in place for R & S to take possession of this generator as part of their larger demolition project for the entire B012.
- Both back-up generators are not to be part of the closure application.
- Both cement pads were inspected for cracks by the fire department inspector and based on observations, no compromise was noted and no additional sampling was required.
- Since no additional sampling was required after the tanks were removed, the vault at B011 and the pad at B012 was left in place.
- The slab at B012 will be dispose of as part of the larger demolition project for the entire B012.
- RDT then completed this Final Closure Report for the City of San Jose.

4.3 Permitting

RDT submitted the Hazardous Materials Storage System Permit Application on October 17, 2006 and received written approval dated October 25, 2006. The permit numbers issued were 06-030763-HZ and 06-030764-HZ and came with Plan Check comments **(Attachment 1.0)**.

4.4 Deviations

There were no deviations on this project.

4.5 Sampling and Analysis

There were no sampling requirements on this project.

5.0 Decontamination Residuals

Rinsate was generated by pressure washing each tank with hot water and simple green. The rinsate generated during this decontamination process was placed into six-55 gallon drums and transferred to B042. Incidental quantities of solid decontamination residuals (e.g. wipes, rags, protective clothing, protective tape, plastic, etc.) were placed into Hitachi supplied fiber drums and also transferred to B042 for final disposition.

6.0 Final Disposition of Waste

The rinsate generated during the decontamination of the tanks was properly manifested and shipped off site by Hitachi. **This consisted of six-55 gallon drums.**

The solid waste generated during the execution of this project (consisting of PPE, wipes, rags, etc.) was placed into fiber drums and removed by the owner to B042 for proper disposal. **This consisted of two-55 gallon drums.**

The pipe generated during the strip out portion of this project was properly manifested and shipped off site by Hitachi. **This consisted of two-55 gallon drums.**

The raw product generated during the drain down portion of this project was properly manifested and shipped off site by Hitachi. **This consisted of one-5 gallon container.**

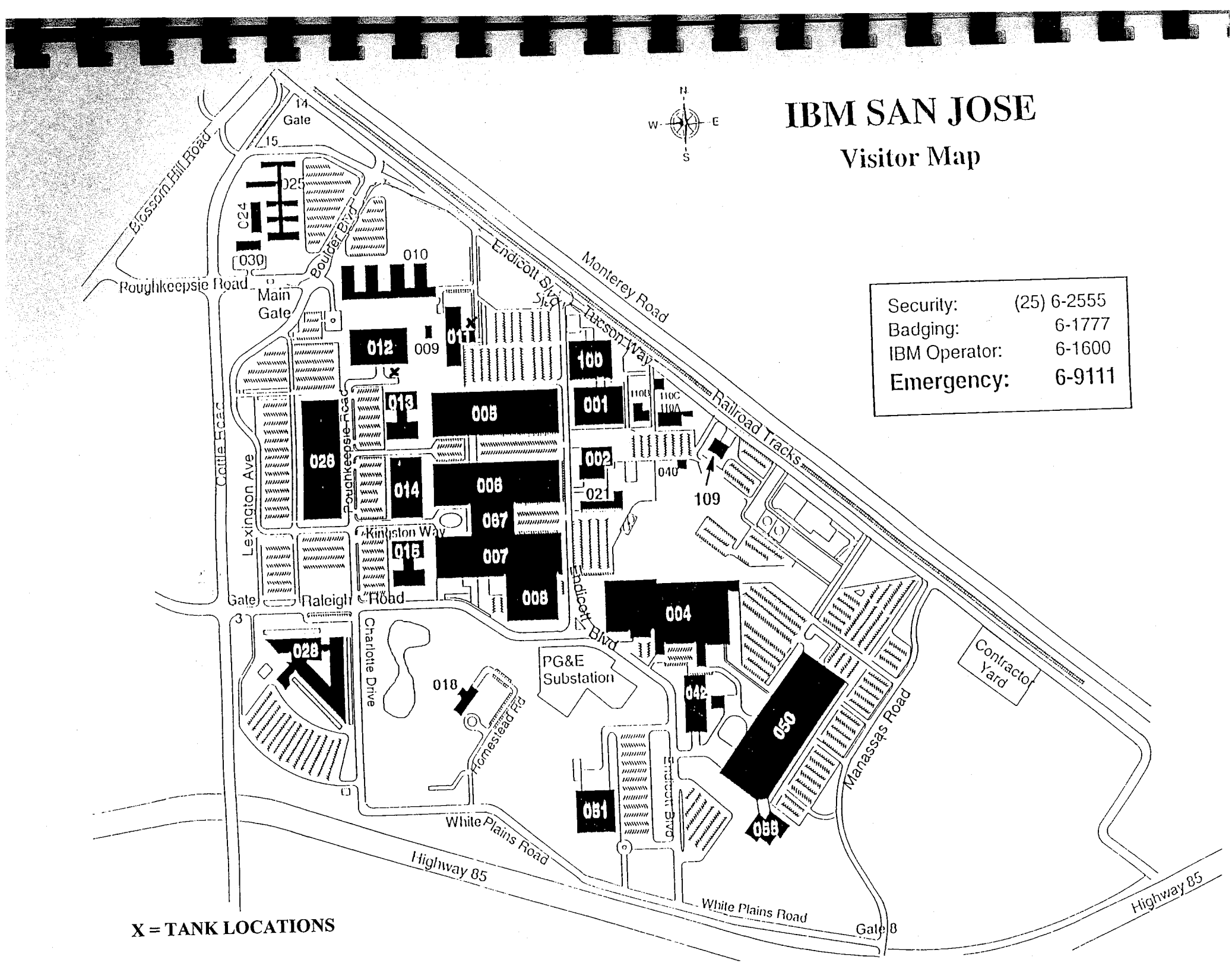
Figure A:

Site Location Map

Please refer to attached Site Location Map for this project.

IBM SAN JOSE

Visitor Map



Security:	(25) 6-2555
Badging:	6-1777
IBM Operator:	6-1600
Emergency:	6-9111

X = TANK LOCATIONS

Attachment 1.0:

Work Plan, Dated 10-17-06 and Plan Check, dated 10-25-06

Please refer to attached Work Plan and Plan Check for this project.

CITY OF SAN JOSE
CAPITAL OF SILICON VALLEY

PLAN CHECK DIRECTIVE AND REQUIRED INSPECTIONS

Hazardous Materials Permit
Bureau of Fire Prevention
San Jose Fire Department

San Jose Fire Department
Bureau of Fire Prevention
Hazardous Materials Division

200 E Santa Clara St
San Jose, CA 95113-1905

POST THIS FORM AT THE JOB SITE

Permit #: 06-030764-HZ
Project Address: 5600 COTTLE RD
SAN JOSE, CA 95193-0000

Date: October 25, 2006

Project Name: HITACHI GLOBAL STORAGE TECH- BLDG. 11
Project Description: 1000 Gallon Diesel Tank and Associated Piping

Applicant:	Mark Dement	Hazardous Materials Contact:	Richard Bryson
Company:	RDT ENVIRONMENTAL SERVICES	HM Contact Phone:	408-535-7692
App Phone:	408-360-0260	HM Contact Fax:	408-292-6067
App Fax:	408-360-0266		
App e-mail:	JIM_ISLES@RDTENV.COM		

Occupancy Group: N/A
Number of Control Areas: N/A
Type of Work: Aboveground Tank/Piping System Removal

PLAN CHECK STATUS – APPROVED

Plans are approved with the following requirements:

Inspection Scheduling: To schedule an inspection, please call 408-535-3555. When you hear the pre-recorded message, press "0" and the next available operator will take your inspection request. Please be prepared to provide the following information in order to effectively complete the process:

1. Provide the Permit Number (above) for the inspections on this permit.
2. Indicate the date you would like the inspection to occur, regardless of when the next best is available.
3. Provide a reasonable time estimate for the inspection to be conducted. Additional time may be needed and purchased to schedule for a complete inspection
4. Request a Final Inspection only when all other listed permit inspections have been scheduled/passed.

1. Identify the exact disposition of the combustible liquids that are removed from the tank. (2002 San Jose Fire Code Section 7902.1.7.3.2)

2. Identify the exact disposition of the rinsate prior to shipment offsite.

3. Provide written documentation in accordance with Title 22 of the Health and Safety Code that the tank has been decontaminated prior to moving the tank.

A final report must be prepared to include copies of all manifests showing transport of rinsate and piping after all closure activities are complete.

After the final report is received, a copy of the closure application will be provided, showing final closure approval. If you have any questions regarding this project, please contact the Hazardous Materials Inspector identified above.

CITY OF SAN JOSE
CAPITAL OF SILICON VALLEY

PLAN CHECK DIRECTIVE AND REQUIRED INSPECTIONS

Hazardous Materials Permit
Bureau of Fire Prevention
San Jose Fire Department

POST THIS FORM AT THE JOB SITE

San Jose Fire Department
Bureau of Fire Prevention
Hazardous Materials Division

200 E Santa Clara St
San Jose, CA 95113-1905

Date: October 25, 2006

Permit #: 06-030763-HZ
Project Address: 5600 COTTLE RD
SAN JOSE, CA 95193-0000

Project Name: HITACHI GLOBAL STORAGE TECH - BLDG. 12
Project Description: 500 Gallon Diesel Tank and Associated Piping

Applicant:	Mark Dement	Hazardous Materials Contact:	Richard Bryson
Company:	RDT ENVIRONMENTAL SERVICES	HM Contact Phone:	408-535-7692
App Phone:	408-360-0260	HM Contact Fax:	408-292-6067
App Fax:	408-360-0266		
App e-mail:	JIM_ISLES@RDTENV.COM		

Occupancy Group: N/A
Number of Control Areas: N/A
Type of Work: Aboveground Tank/Piping System Removal

PLAN CHECK STATUS – APPROVED

Plans are approved with the following requirements:

Inspection Scheduling: To schedule an inspection, please call 408-535-3555. When you hear the pre-recorded message, press "0" and the next available operator will take your inspection request. Please be prepared to provide the following information in order to effectively complete the process:

1. Provide the Permit Number (above) for the inspections on this permit.
2. Indicate the date you would like the inspection to occur, regardless of when the next best is available.
3. Provide a reasonable time estimate for the inspection to be conducted. Additional time may be needed and purchased to schedule for a complete inspection
4. Request a Final Inspection only when all other listed permit inspections have been scheduled/passed.

1. Identify the exact disposition of the combustible liquids that are removed from the tank. (2002 San Jose Fire Code Section 7902.1.7.3.2)

2. Identify the exact disposition of the rinsate prior to shipment offsite.

3. Provide written documentation in accordance with Title 22 of the Health and Safety Code that the tank has been decontaminated prior to moving the tank.

A final report must be prepared to include copies of all manifests showing transport of rinsate and piping after all closure activities are complete.

After the final report is received, a copy of the closure application will be provided, showing final closure approval. If you have any questions regarding this project, please contact the Hazardous Materials Inspector identified above.

October 17, 2006

FROM
06-030764-
HZ

Work Plan for Two Diesel Tanks and Associated Piping Outside of B011 and B012 at the Hitachi Campus in San Jose, California

This Work Plan has been developed by RDT Environmental Services, Inc. (RDT) to support Hitachi Global Storage Technologies, Inc. (Hitachi) with the issuance of a "Closure Permit" from the San Jose Fire Department, Hazardous Materials Division. The project outlined in this work plan is for the decontamination of two tanks, strip out of associated piping, and drain down on one back-up generator. The project is located at the Hitachi campus in San Jose, California located at 5600 Cottle Road, San Jose California.

The work location is outside of Building 011 on the North East side and both inside and outside of Building 012 on the South side.

Scope of Work

Working with Hitachi's E H & S department, RDT will follow the Hitachi SOW prepared for this project dated 9-7-06 for the closure of two tanks and associated piping.

In general, we will complete the following scope of work on this project which will consist of the following major components:

1. Hitachi will notify BAAQMD about the closure of these two tank systems.
2. RDT will write a work plan and submit a closure application to the San Jose Fire Department, Hazardous Materials Division.
3. Facility maintenance will empty the raw product from both tanks.
4. RDT will decon both tanks and drum up the associated piping as hazardous waste.
5. The tank at B011 will be sent to Sims Metal along with the roof over the tank to be recycled.
6. The tank will first be triple rinsed and the rinse water will be collected.
7. After this is complete, the tank will be made safe for removal from the vault by adding dry ice sufficient to achieve an atmosphere of either less that 10% oxygen or less then 20% LEL.

Disposition?

Title 22 Standards

Disposition?

APPROVED FOR COMPLIANCE WITH HAZ MAT REQUIREMENTS WITH REQUIREMENTS.
10-25-06 DATE
DATE

8 Before the tank leaves the Hitachi campus, a 2' by 2' hole will be cut into the tank rendering it useless. The tank will be taken to Sims Metal for recycling.

9 The back-up generator at B011 will be moved to the tennis courts for future use. The fluids will stay in place since the generator will be reused by Hitachi.

10 The tank at B012 will be moved to B100 for future use.

11 Prior to this taking place, the tank will be triple rinsed and the rinse water will be collected.

12 The tank will be decontaminated to scrap metal status and once the fire department clears the tank, Hitachi will want the tank moved to B100 to be used as the primary fuel tank there.

Need Installation →

13 The back-up generator inside Building 012 will have the fluids removed as much as is practical and be containerized. R & S will take possession of this generator as part of their larger demolition project for the entire Building 012.

14 Both back-up generators are not to be part of the closure application.

15 Both cement pads will be inspected for cracks by the fire department inspector and based on observations, if compromised, may require additional sampling.

16 If sampling is required, then RDT will follow the Hitachi "General Requirements" dated 9-7-06.

17 If no additional sampling is required after the tanks are removed, then the vault at Building 011 will be abandoned in place.

18 The slab at Building 012 will be left in place for R & S to dispose of as part of their larger demolition project for the entire Building 012.

19 RDT will complete the Final Closure Report for the City of San Jose.

The schedule for the proposed scope of work is shown below:

Work Item	*Work Days From Start*
Obtain Permit:	Days 1 – 21
Mobilization:	Days 21 – 22
Decontamination of Two Tanks and Strip Out of Associated Pipes:	Days 22 – 26
Remove Two Tanks and Relocation of One Back-up Generator:	Days 27 – 29
Draft Closure Report Submitted:	Day 30 - 50

APPROVED FOR CONSTRUCTION WITH HAZ MAT REQUIREMENTS.
DATE 10-25-06

Locations of all locked out and tagged out equipment, pumps, valves, instruments, and power switches

These locations will be finalized with the appropriate subcontractors and Hitachi's personnel 48 hours prior to the working on any systems.

Equipment shutdown and facility coordination requirements

Work Item (as applicable)	*Contact*
Shutdown of chemical systems, utilities, fire suppression, controls	Hitachi's Construction Coordinator
Electrical and mechanical shutdown	Hitachi's Construction's Site Coordinator
Containerizing of:	
PPE Waste	Hitachi's Waste Engineer
Electrical Gear	Hitachi's Materials Recovery
Residual Chemicals/Wastes	Hitachi's Waste Engineer
Piping, Other Solid Materials	Hitachi's Waste Engineer
Decontamination Fluids	Hitachi's Waste Treatment Plant Operator
Sampling (if any)	Hitachi's Environmental Engineer

Methods of decontamination and surfactants to be used

All piping will first be drained down, and drummed up as hazardous waste. The two tanks will be tripled rinsed with Simple Green and water. The one generator in Building 012 will be drained down of coolant and diesel fuel. All materials will be treated on site, recycled, or disposed of off site in accordance with all applicable regulations as well as Hitachi site standards.

Estimate of rinsate

It is estimated that approximately 600 gallons of rinsate will be generated. The rinsate will be placed into owner-supplied drums, and then shipped off site following appropriate regulatory guidelines.

Disposal of the pipes from both tanks

After the pipes are drained, they will be drummed up as hazardous waste and disposed of properly by Hitachi. The City of San Jose, Hazardous Materials Division, may also inspect the pipes during the course of the project.

APPROVED FOR CONFORMANCE WITH HAZ MAT REQUIREMENTS.
10-25-06 DATE

Disposal of the tank at Building 011

After the tank has been deconed and a hole cut into it, the tank will be shipped off to Sims Metal for recycling. The City of San Jose, Hazardous Materials Division, will witness the tank after decontamination and prior to removal from the vault before shipment from site.

Relocation of the tank at Building 012

The tank will be deconed and made safe for relocation to Building 100 by adding dry ice sufficient to achieve an atmosphere of either less that 10% oxygen or less then 20% LEL. This tank will used as the primary fuel tank at Building 100. The City of San Jose, Hazardous Materials Division, will witness the tank after decontamination and prior to relocation to Building 100.

Locations of samples and methods of analysis

No samples of the tanks or pads will be taken at this time on the proposed project. If after visual inspection of the pads, the fire department determines further investigation is warranted, the pad will be cored at each end. At depths of 1', 3' and 6' the soil will be analyzed for:

1) TPHD 8015M or 8260
2) BTEX 8260
3) EDB and EDC 8260
4) MTBE, TAME, ETBE, DIPE and TBA by 8260.

Waste labeling and management requirements

All waste labeling and management will be conducted in accordance with all applicable state, local, and federal regulations. Additionally, all waste and closure issues will be conducted to comply with Hitachi's site closure plans and the Standard Environmental Scopes of Work, May 2001, rev.1 and Contractor Guide/January 2005/Version 2.1).

APPROVED FOR OBTAINING ... HAZ MAT REQUIREMENTS.
DATE 6/23/06